

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

In re:

INTEGRATED HEALTH SERVICES, INC.,
et al.

Debtors.

Case No. 00-389 (MFW)
Jointly Administered

IHS LIQUIDATING LLC,

Plaintiff,

v.

ACE INDEMNITY INSURANCE COMPANY
f/k/a INDEMNITY INSURANCE COMPANY
OF NORTH AMERICA,

Defendant.

Civil Action No. 05-376 (GMS)

IHS LIQUIDATING LLC,

Third-Party Plaintiff,

v.

NATIONAL UNION FIRE INSURANCE
COMPANY OF PITTSBURGH, PA,
GENERAL STAR INDEMNITY COMPANY,
and ACE INDEMNITY INSURANCE
COMPANY f/k/a INDEMNITY INSURANCE
COMPANY OF NORTH AMERICA,

Third-Party Defendant.

NOTICE OF DEPOSITION

TO: Francis J. Deasey, Esquire
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The Buckner Building
1308 Delaware Avenue
Wilmington, DE 19801

PLEASE TAKE NOTICE that Third-Party Defendant General Star Indemnity Company ("GenStar") will take the deposition of the Defendant ACE Indemnity Insurance Company, f/k/a Indemnity Insurance Company of North America ("Defendant") pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure on Tuesday, February 27, 2007, at 10:00am, at the offices of Cohen Seglias Pallas Greenhall & Furman, PC, Nemours Building, 1007 North Orange Street, Suite 1130, Wilmington, Delaware 19801, before a Notary or other competent authority authorized to administer oaths. The examination will continue from day-to-day until completed. The testimony shall be recorded by stenographic means.

Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, the Defendant shall designate one or more of its officers, directors or managing agents, or such other persons who consent to testify on its behalf, to testify on the following matters:

1. The Defendant's receipt, investigation, handling, adjustment and disposition of liability claims made against Integrated Health Services, Inc. ("IHS"), Integrated Health Services of Lester, Inc. ("Lester") and/or any subsidiary of IHS or Lester.

2. The formation of and bases for Defendant's claim that a certain policy of insurance issued by GenStar to IHS covering the period from January 1, 1999 to January 1, 2000 is not properly exhausted.

3. The formation and bases for Defendant's claim that certain policies of insurance issued by Third-Party Defendant National Union Insurance Company of Pittsburgh, PA to IHS and Lester covering the period from January 1, 1999 to January 1, 2000 are not properly exhausted.

Of Counsel:

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COHEN SEGLIAS PALLAS GREENHALL &
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/S/ James F. Harker

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*Attorneys for General Star Indemnity
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Dated: February 15, 2007

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